

I wish to file a comment in support of the SBE petition to stay the new PCN Rules for one year.

Indeed, I question the need for these rules to be applied to BAS services at all. Broadcasters, through coordinators and the SBE, have done a pretty good job of frequency coordination of these services.

These new Rules will cause a tremendous increase in costs and expense for those filing for BAS services. The burden will be particularly odious to non-profit, educational, and religious broadcasters who have not previously had to pay for these services. While it is understood that anyone can take the task of PCN on by themselves, the extra time and work caused by these new rules will still be very significant.

As stated by the SBE in their petition, a major problem with this whole idea is the fact that the ULS database is woefully incomplete. This fact alone will make PCN ineffective, whether done by an outside service, or by the applicant themselves.

It is pointless to require a coordination search when it is known in advance that the results will be flawed due to the lack of adequate or accurate database information.

Respectively submitted,

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